

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

JUN 20 2002

Michael N. Milby, Clerk

IN RE ENRON CORPORATION)	No. H-01-3624
SECURITIES LITIGATION)	
)	Hon. Melinda Harmon

PAMELA M. TITTLE, et al.,)	No. H-01-3913
)	(consolidated with H-01-3624)
Plaintiffs,)	
)	
v.)	
)	
ENRON CORP., et al.,)	
)	
Defendants.)	

DEFENDANT ANDERSEN-UNITED KINGDOM'S
MOTION TO DISMISS THE FIRST CONSOLIDATED
AND AMENDED COMPLAINT

Defendant Andersen-United Kingdom respectfully moves this Court for an order dismissing the First Consolidated and Amended Complaint. In support thereof, Andersen-United Kingdom states the following grounds:

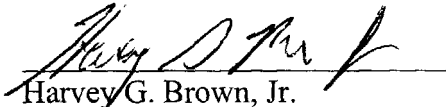
1. This Court lacks personal jurisdiction over Andersen-United Kingdom because it has not had the "minimum contacts" with Texas to provide such jurisdiction and because finding jurisdiction over it would offend "traditional notions of fair play and substantial justice." *See* Fed. R. Civ. P. 12(b)(2).

2. Andersen-United Kingdom hereby expressly incorporates its memorandum in support of this motion, which it is filing contemporaneously.

WHEREFORE, Defendant Andersen-United Kingdom respectfully requests this Court to enter an order dismissing the Consolidated Complaint against it with prejudice.

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Respectfully submitted,



Harvey G. Brown, Jr.

S.D. Texas Bar No. 3178

State Bar No. 03130500

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Andersen-United Kingdom

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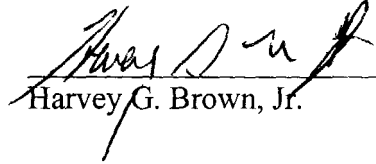
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing DEFENDANT ANDERSEN-UNITED KINGDOM'S MOTION TO DISMISS to all counsel of record on the attached Service List pursuant to the Court Order dated April 10, 2002 on this the Fifth day of June, 2002.



Harvey G. Brown, Jr.

The Service List

Attached

to this document

may be viewed at

the

Clerk's Office